



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

Bob Kay

May 19, 2011

REPLY TO THE ATTENTION OF:

William B. Dotterrer  
Nationwide Environmental Services, Inc.  
14818 6<sup>th</sup> Avenue West  
Suite 5A  
Golden, Colorado 80401

US EPA RECORDS CENTER REGION 5



415981

Dear Mr. Dotterrer:

Attached are our comments on your March 4, 2011 ground water monitoring results for the SE Rockford Site. Please revise the document to incorporate these comments and resubmit 30 days from receipt of this letter.

Please add a map of the water-table configuration. A table of historical water levels in each well would also make the causes of the trends in VOC concentrations easier to identify.

First Bullet Page 2: Please re-write the second sentence, perhaps as two sentences, to clarify that

- a. VOC concentrations in well MW-113A have been decreasing overall during the past several (five?) monitoring events, and
- b. VOC concentrations in well MW113B have increased from the beginning of the monitoring period, but have been generally stable for the past several years.

Second Bullet Page 2: Please re-write this section to distinguish between MW-114A, where VOC concentrations have decreased since the start of monitoring but have typically increased slightly during the past three monitoring events, and MW-114B, where concentrations have been essentially stable during the period of monitoring.

Fourth Bullet Page 2: Please re-write to note that VOC concentrations (particularly 1,1-DCA) in well MW-201 have been decreasing for the past three monitoring events and that VOC concentrations in well MW-202 have been generally stable at low concentrations for the past several monitoring events.

Sixth Bullet Page 2: Please re-write to note that, while TVOC concentrations in well MW-102A have been increasing overall for the past several monitoring events VOC concentrations in well MW-102B have been stable at low concentrations for the entire period of monitoring.

Fifth Bullet, Page 3: Please reword this bullet to note that the VOC ratios indicate biodegradation (one component of natural attenuation) is occurring at the site, however, degradation products past DCE and DCA have generally not been observed."

Table 1: Please correct the MCLs in the table. The MCLs for almost all of these compounds are incorrect. Please get the correct MCLs (table 2 has them) and redo the table to bold the correct results.

Table 2: Please include the cumulative results for vinyl chloride.

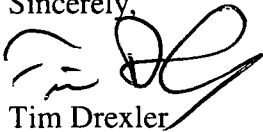
Appendix B: There are improvements in sample collection compared to the readings obtained during the last sampling event. However, some DO readings also are in excess of 10 mg/L, which is unlikely. Please ensure proper calibration before sampling.

The QAPP calls for a reading of field parameters every 3 to 5 minutes with stable parameter readings over three consecutive readings. Therefore, these wells should have been purged for a minimum of 9 minutes before samples were collected. Samples were collected from wells MW47, MW-102B, MW-114A, and MW-206C before 9 minutes of purging was performed. These three wells were not sampled in accordance with approved QAQC.

The QAPP calls for stabilization of field parameters for three consecutive readings before a sample can be collected. Criteria for stable parameters were not recorded for three consecutive readings on a 3 minute interval in at least wells MW-101A, -101B, -101C, -101D, and -102A. In addition, the pH is unrealistically high (10) in well MW-102A, improbably low in well MW-102B (less than 5) and improbably high (9) in well MW-102C. Please provide the instrument calibration responses, times, and calibration standards, that are recorded as a part of the approved QAPP, for these wells for our review so that we can check to see that there isn't an instrument problem.

Thank you for your attention. Please feel free to contact me at (312) 353-4367 or at [drexler.timothy@epa.gov](mailto:drexler.timothy@epa.gov) to discuss.

Sincerely,



Tim Drexler  
Remedial Project Manager

cc: D. Wilson, IEPA  
N. Miller, City of Rockford